Exhibit 3

This writing will confirm our agreement relating to the prosecution of the City of Dearborn Heights Act 345 Police & Ret. Sys. v. Chicago Bridge & Iron Co. N.V. et al., No. 1:17-CV-1580 (to be consolidated with Thomas Hubbell v. Chicago Bridge & Iron Co. N.V. et al., No. 1:17-CV-2414) putative class action securities litigation. As we discussed, our firms, Kahn Swick & Foti, LLC, ("KSF") and Pomerantz LLP ("Pomerantz"), and our respective clients Alsar Limited Partnership ("Alsar") and Ironworkers Locals 40, 361, 417, 580 ("Ironworkers"), agree that in the event any of our respective clients (including a subset or single member of Ironworkers) is appointed lead plaintiff and the selection as lead counsel of KSF or Pomerantz is approved by the Court, KSF and Pomerantz will split any attorney fee awarded by the Court 50/50. In the event local counsel must be retained, any fee to local counsel will come off the top.

Each firm agrees to use good faith and best efforts to do its 50 percent share of the work. In connection therewith, lodestar may be exchanged at periodic intervals at either firm's request. In the event that either firm in its view determines that the other has done less than its fair share of the work as the litigation progresses, it should provide written notice and an opportunity for the other firm to respond and cure, if necessary. The firms agree to split all reasonable expenses in the litigation. If either firm determines that the other has failed to pay its share of the expenses, that firm should provide written notice and an opportunity to cure.

The parties will endeavor to include all clients as named plaintiffs and/or proposed class representatives in the amended complaint and both firms as signatories on the filings in the case, but in no event will the failure to do so, or the inability of any of the clients to serve as a named plaintiff and/or certified class representative, constitute a violation of this agreement.

AGREED by:

8/17

Kim Elaine Miller

KAHN SWICK & FOTI, LLC

206 Covington Street

Madisonville, LA 70447

USA

(212) 696-3730

Fax: (504) 455-1498

Email: Kim Miller@ksfcounsel.com
Counsel for Lead Plaintiff Movant

.

Alsar

1

WIT: Dherfy
DATE: 3-19-19
DEBRA STEVENS, RPR, CRR

Miller

Alsar Limited Partnership

Representative

Jeremy A. Lieberman POMERANTZ LLP

600 Third Avenue, 20th Floor

New York, NY 10016

USA

(212)-661-1100

Fax: (212)-661-8665

Email: <u>Jaliebermun@pomlave.com</u>
Counsel for Lead Plaintiff Movant

Iranworkers

Wellalin

Monworkers Locals 40, 364 & 417 Union Security Funds Representative

Ironworkers Local 580 - Joint Funds Representative

Alsar Limited Partnership Representative

Jeremy A. Lieberman POMERANTZ LLP

600 Third Avenue, 20th Floor

New York, NY 10016

USA

(212)-661-1100

Fax: (212)-661-8665

Email: Jaliebermanaipppulaw.com Counsel for Leud Plaintiff Movant

Ironworkers

Ironworkers Locals 40, 361 & 417 Union Security Funds Representative

Ironworkers Local 580 - Joint

Funds Representative